

Susan Tae, Supervising Regional Planner  
Community Studies North Area  
320 Temple T, Room 1354  
Los Angeles, CA 90012

Jay Lee, Planner  
Renewable Energy Ordinance  
Dept of Regional Planning  
320 W. Temple St. 13<sup>th</sup> Floor  
Los Angeles, CA 90012

16 March 2015

In Regards to REO 3

Dear Madam and Sir:

My name is Jeff Olesh. As a Los Angeles County resident for six decades, I appeal upon your appointed duties to hear my voice regarding the forth coming implementation of green energy regulations in the unincorporated LA County area. Specifically, I refer to REO 3 (Renewable Energy Ordinance) which is to come before your purview forthwith.

I am the Treasurer and an elected Board Member of the Lake Elizabeth Water Company, as well as a Board Member for the Transition Habitat Conservancy. It is my honor and privilege to be able to serve these two entities. They are both unpaid positions and are important and necessary civic duties, Given this, and the concerns that come from their respective responsibilities, I have a few questions to ask and ideas to consider in regards to the third ROE and its impact upon our rural community and Los Angeles County in general.

The following are all in the spirit of a sustainable, habitable and reasonable living space for all of us. The following is in regards to ROE Title 22:

Question: Do the Community Standards adopted by the Lakes and Valleys regarding ridgeline setbacks (Sec 60 22.44.143 of 150' vertical and horizontal) override the stated 50' in the ROE document (Sec 22.52.1620 C 6)? And if not, why have community standards to begin with?

Section C5 of 22.52.1635 (page 57) completely and totally removes any language regarding the impact of utility scale development on birds and bats. The fact of the matter is that there is a **provable** negative impact on birds and bats in so far as these projects are concerned. The language from **Draft 2** should be reinstated, recognizing that.

Regarding section C5 i of 22.52.1635 I would like to take issue with the quarter mile setback in the regulation (.25 as listed). The reasonable setback would be 2.0 with respect to sections (a), (b) & (c) (see table re: poor line, scenic drive and highway routes).

From the same subset table (22...52.1635-A) the on site residence and property line ought to be changed from 2 times the tallest height to 2.0 miles in order to secure a reasonable, safe and livable space. Scenic drives, routes and highways should also be included in this setback.

Water quality is addressed on page 68. The sections and subsections are beyond me at this point. Quarterly checks by a state licensed hydrologist are paramount given our current global and state situation.

Thank- You

Jeff Olesh

Jay Lee

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**From:** Jill Moran [jillrmoran@gmail.com]  
**Sent:** Sunday, April 19, 2015 8:50 PM  
**To:** Susan Tae; Jay Lee  
**Subject:** Industrial Wind - Proposed Los Angeles County Renewable Energy Ordinance

Dear Ms. Tae and Mr. Lee,

RE: Proposed Los Angeles County Renewable Energy Ordinance

Industrial Wind: There should be no industrial wind installations allowed in Los Angeles County. There are no areas in the county where industrial wind installations can be placed without severe detrimental consequences for rural residents, recreational resources, valued viewshed areas and threatened species. State and Federal agencies have in fact recognized that Los Angeles County is not "a place of opportunity" for wind projects. That recognition is reflected in the Preferred Alternative of the Desert Renewable Energy Conservation Plan (DRECP) proposed by the California Energy Commission, California Department of Fish and Wildlife, Bureau of Land Management, and the U.S. Fish and Wildlife Service.

The DRECP Executive Summary, states that there are "Opportunities for dispersed [industrial] solar development" in seven counties, including Los Angeles. However, when listing "Opportunities for dispersed wind development" Los Angeles County is not included. In addition, on page 116 of Chapter 11.3, Preferred Alternative, Table 19.a "Technology Type by County" lists only solar for Los Angeles County (page 28).

Additionally, industrial utility-scale wind energy projects would not be an allowed use in the Santa Monica Mountains Local Coastal Program, due to infringement on required preservation outlined in the document listing scenic resource protection policies that "apply to all other areas that are on, along, or within, or visible from scenic routes, public parklands, trails . . . that offer scenic vistas of the mountains, canyons, coastline and other unique natural features for the permanent protection of their habitat and open space values" (SMMLCP, Policies LU-34, LU-35). The rest of the county gets "mitigation" in the form of landscaped buffer zones and setbacks that prove far from adequate in protecting viewshed from private and public trust lands and private properties exposed to the industrial nature of large-scale renewable energy projects.

Respectfully Yours,

Jill R Moran  
46472 Kings Canyon Road  
Lancaster, CA 93536  
[jillrmoran@gmail.com](mailto:jillrmoran@gmail.com)



**Jay Lee**

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**From:** Dave/Sandy [trubereans@fastmail.fm]  
**Sent:** Monday, April 20, 2015 4:38 AM  
**To:** Susan Tae; Jay Lee  
**Cc:** Rosie Ruiz; HICKLING, Norm, lac; evizcarra@lacbos.org  
**Subject:** Proposed Los Angeles County Renewable Energy Ordinance

April 20, 2015

Dear Ms. Tae and Mr. Lee,

RE: Proposed Los Angeles County Renewable Energy Ordinance

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**Industrial Wind Fire Hazard:** One of our most serious concerns is the fire hazard posed by utility-scale wind energy positioned along our mountains and grassland areas, all considered “Extremely High Fire Hazard Areas.” Research confirms a serious level of threat by wind turbines (detailed in an article found at [www.fireengineering.com](http://www.fireengineering.com).) Several important points to consider in allowing utility-scale wind projects: Wind turbines are industrial facilities subject to a full range of emergencies such as fire, entrapments, electrical accidents, falls, and even hazmat; turbines are full of various fuels like electrical cables, plastics, combustible metals, and petroleum based fluids and lubricants; lightening strikes to turbines can ignite fires; mechanical friction in moving parts and electrical short circuits can cause fire; fire can spread to surrounding areas readily from burning fuels, metals, and plastics; responding fire departments may normally be several miles away and have to travel over roads that quite often require all-wheel-drive vehicles; primary limiting factors to fire department intervention are the height of the fire and the extremely limited vertical access.

Furthermore, aerial firefighting would be hindered in a field of wind turbines, and would exclude the use of multiple high-capacity loads of retardant from large air tankers. Air tankers typically make retardant drops from a height of 150 to 200 feet above vegetation and terrain, at air speeds from 125 to 150 knots (American Helicopter Services and Aerial Firefighting Association at AHSFA.org). Without high-capacity loads of retardant from large air tankers, uncontrolled wildfire would devastate our rural communities.

**Inadequate Landscaping:** There should be a moratorium on new industrial solar installations in the Antelope Valley until adequate drought tolerant landscaping is demonstrated at an existing solar installation, is shown to protect against wind-driven dust events, and actually buffers the viewshed from the degrading industrial qualities of ground-mounted large-scale renewable energy projects. Thus far, landscaping plans have not delivered adequate results. The Renewable Energy Ordinance only requires “conceptual landscape plans,” using native and non-native drought tolerant plants, and offers nothing new. It has proven difficult to disguise the visual effects of large-scale solar projects, and there is no way to adequately landscape or mitigate viewshed destruction for wind turbines.

**Dust Control:** Up until now, no dust control plan has proven adequate in controlling wind-driven dust events. Extensive research indicates that exposure to outdoor PM10 and PM 2.5 levels exceeding current air quality standards is associated with increased risk of hospitalization for lung and heart-related respiratory illness, including emergency room visits for asthma. Airborne Particulate Matter (PM) exposure is also associated with increased risk of premature deaths, especially in the elderly and people with pre-existing cardiopulmonary disease. In children, studies have shown associations between PM exposure and reduced lung function and increased respiratory symptoms and illnesses. Besides reducing visibility, the acidic portion of PM (nitrates, sulfates) can harm crops, forests, aquatic and other ecosystems.

While all the wind-driven dust events cannot be blamed solely on permitted utility-scale solar projects, they have substantially contributed to additional particulates that have caused unsafe driving conditions, dust bowl conditions, and health effects to those residents in the Antelope Valley. With cyclic droughts and more solar projects instead of agricultural production (which prevents erosion while under planting conditions), rural residents will be subjected to continued and increasing threat to their health from dust, and especially Valley Fever.

**Valley Fever:** Valley Fever has increased five hundred and forty-five percent in the last decade in the Antelope Valley. Continued soil disturbance from construction of solar projects will drive this percentage higher. While projects are not permitted to remove existing vegetation, they are allowed to grade roads and set-up areas and must maintain a fire safe area around buildings and transmission/gen-ties. Observation of dust events, emanating from SCE’s TRTP transmission access roads proves this point.

The Renewable Energy Ordinance does not require soil testing for Valley Fever spores on prospective small or large-scale solar and wind energy project sites. Los Angeles County Department of Public Health Epidemiologist, Dr. Ramon Guevara, has stated in his response letter to Renewable Energy Ordinance Draft 2: “There are no standards of criteria here for what is acceptable in terms of amount and duration of resultant dust, measurements of dusts, and rules for feasibility and appropriateness of vegetation preservation, planting, and maintenance. These should be put forth with processes to involve the surrounding communities.” This has not appeared in the REO.

Residents of the Antelope Valley deserve concrete, detailed dust monitoring and control plans in place (with reports available to the public) and these should include air quality monitoring stations in the vicinity of projects required in the permitting process that will determine the levels of particulate matter in the air, reflecting the success or failure of vegetation-based dust control techniques and soil binding products, to protect the population from Coccidioidomycosis.”

**Avian Protection:** Impose a moratorium on new industrial solar installations in the Antelope Valley until adequate on-site studies of existing solar installations are conducted by qualified, independent biologists to quantify avian death due to lake effect. The Antelope Valley is home to an Audubon designated Globally Important Bird Area, the Pacific Flyway, and other protected migratory and locally indigenous birds, including Bald and Golden Eagles, and California Condors protected by state and federal law.

**MCUP:** Minor Conditional Use Permits (MCUPs), as written in the Draft Renewable Energy Ordinance, limit the public’s right to be informed and make comments, and should not be permissible for any utility-scale, or energy produced from wind or solar development. The MCUP allows accessory uses of a substantial nature currently unchanged in this Draft REO--such as so-called small scale solar energy system covering 2.5 acres of a 5 acre parcel, Modification of Significant Ridgeline protections, structure mounted utility-scale wind energy facilities, and temporary met towers.

Any utility-scale energy production sent “offsite” in any zone, and those projects requiring a MCUP are relieved of the public signage process detailed in Los Angeles County Planning and Zoning Ordinance Section 22.60.175. The REO further exempts MCUPs from the noticing requirements to adjacent landowners and the public in 22.56.030 as seen stricken from the revised April 7th Draft REO on pages 74 and 75. The current County Ordinance requires notification, signage, and opportunity for adjacent land owners and interested parties the opportunity to request a public hearing. This leads to the question of whether the Minor Conditional Use Permit process is being revised through this ordinance, or if exemption of noticing applies only to this REO. If it is being revised through this ordinance, the public should be informed specifically that this is the case. Members of the public should be able to receive appropriate noticing by mail, by signage, request a hearing, and have the right to appeal to their elected officials any project that requires a MCUP or a CUP.

Acreage limits for ground mounted residential use solar:

On-site ground mounted solar should be limited to one quarter acre of coverage; this is enough to power 8 homes. This would qualify as “primarily off-site” use and would then be “utility-scale” according to Regional Planning’s determination of 50% on-site use for small scale, a “by right” permitting process with no MCUP or CUP. There is no justification for the proposal to allow up to 2.5 acres of ground mounted solar for residential use in all zones. Allowance of 2.5 acres open the door to installations that masquerade as on-site use but are really intended to generate income through off-site energy sales. (Visit <http://pristinesun.com/utility.html> for information regarding small landowner and business related solar equipment leasing and arrangement of Power Purchase Agreements). This could be a loophole that allows utility-scale RE in rural communities with only a building permit and no public review. The REO should further refine use by zone, and average usage of a Single Family Residence. We are not opposed to commercial, manufacturing, or industrial areas using their properties and rooftops for utility-scale renewable energy generation, but wish to protect what is left of our rural lifestyle, unique rural community atmosphere, and health, happiness and welfare of residents.

Noise: The human environment contains a variety of noise sources that can affect the way people live and work and, generally, negatively impact quality of life. Excessive levels may result in physiological effects such as hearing loss, speech interference, and sleep interference, as well as behavioral responses, such as increased neighborhood annoyance and dissatisfaction. Excessive noise can also negatively impact wildlife. Studies have shown that disruption caused by noise can be injurious to an animal's energy budget, reproductive success, and long-term survival.

Title 12 (12.08.390) of the County Code contains the County Noise Control Ordinance, which was adopted by the Board of Supervisors to control unnecessary, excessive and annoying noise. It declared that County policy was to “maintain quiet in those areas which exhibit low noise levels.” The Ordinance divides receptor properties into the categories, but does not include a very quiet rural noise zone.

The Proposed maximum noise level of 60 decibels in the Renewable Energy Ordinance is inappropriate for rural areas. As the chart from the Los Angeles County Noise Ordinance indicates, the 60dB single event noise limit for the operation of solar and wind facilities matches that of commercial and industrial noise levels (55dB, 60dB, and 70dB). The ambient noise level in quiet rural areas is 10dB to 24dB, and up to 50dB in more developed urban residential areas. There is no reason to subject adjoining properties to any additional noise levels beyond measured ambient noise levels. The Renewable Energy Ordinance should require private property, noise sensitive lands and land uses, wildlife /habitats, and public lands be shielded from excessive noise; and require renewable energy development projects to demonstrate that no adverse noise effects on adjacent uses will occur from the project; that provisions for preservation of quiet ambient noise levels be required by all renewable energy projects.

Social/Environmental injustice: Rural residents of coastal Los Angeles County and the Santa Monica Mountains, have “rural villages”, and recreational viewshed areas extensively protected by the county’s Santa Monica Mountains Local Coastal Program’s Land Use Plan. Its stringent provisions will undoubtedly eliminate threats from industrial wind or solar in these areas. However, no similar protection exists for rural residents and valued viewsheds of the canyons and northern slopes of the San Gabriel Mountains or adjoining Mojave Desert portion of Los Angeles County. This perpetuates social injustice of the existing conditions where less affluent

residents and those without resources to oppose large renewable energy projects are being subjected to the majority of impacts and damage to quality of life—including threat of ill health, and loss of property values created by industrial wind and solar installations. This is socially and economically indefensible. Rural communities of the Antelope Valley deserve the same protections from intrusive renewable energy projects.

Yours truly,

David and Sandra McCrae  
47211 212th St. W.  
Lancaster, CA 93536  
(Mail: P.O. Box 2423, Lancaster, CA 93539)

(cc: R. Ruiz, "Please distribute these comments to Commissioners.")



Jay Lee

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**From:** Judy Watson [j\_a\_c\_1940@yahoo.com]  
**Sent:** Monday, April 20, 2015 12:40 PM  
**To:** Susan Tae; Norm Hickling; evizcarra@iacbos.org; Jay Lee  
**Subject:** Wind/Solar projects

This letter, below, is in today's AV Press I want to share it with you. Even in Kern county, people are sick of this invasion. Complaints are far and wide, enough is enough. When will you start listening to the people, the ones that have to live with these projects?

Judy Watson  
Lancaster.

I sat at many meeting in Mojave over the windmill projects. Every mention of opposition was met with strong overtones from Mrs. Oviato (county planner) and reps from the interested companies. All forms of concerns by the locals were diverted, hushed or given lame answers. The concerns over the view being destroyed was met with "you bought the land, not the view"! Environmental impact concerns were met with false short term studies, if any. Doing my homework prior; flicker effects, hum/vibration effects as well as the habitat destruction and unknowns are not limited to the animals but humans also. The forced migration of prey has been driven into our areas closely followed by the predators. The property value dropped based on proximity to each project. I was told each windmill has 660volts of electricity run to each, needs start up power. As far as solar, millions of gallons of water has/is being used to combat the dust in this windy dry environment. In a drought situation? Really? To be efficient they need to be cleaned and lose 1% efficiency a year. Those meetings kept highlighting the tax revenue for the county. These projects were not shoved down our throats, but rather up our hind end! Money talks.

Dave Rakisits  
Mojave



Jay Lee

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**From:** Three Points-Liebre Mountain Town Council [3pointsliebremountain@gmail.com]  
**Sent:** Monday, April 20, 2015 2:21 PM  
**To:** Susan Tae; Jay Lee  
**Cc:** Norm Hickling; Edel Vizcarra; Rosie Ruiz  
**Subject:** Renewable Energy Ordinance Letter

Three Points-Liebre Mountain Town Council

P.O. Box 76

Lake Hughes, CA 93532

[3pointsliebremountain@gmail.com](mailto:3pointsliebremountain@gmail.com)

20 April 2015

SENT VIA EMAIL

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CSDs: Community Standards District documents should prevail unless more stringent and/or protective measures occur in the Renewable Energy Ordinance. Some CSDs contain height limits that should be observed, as well as impervious surface provisions that intend to prevent erosion. Significant ridgeline protection should not be easily amended with the proposed MCUP in the REO, dated April 7th, that strikes out signage, and noticing requirements (RE Supplemental Package, pages 73, 74, 75, 76).

**Social/Environmental injustice:** Rural residents of coastal Los Angeles County and the Santa Monica Mountains, have “rural villages”, and recreational viewshed areas extensively protected by the county’s Santa Monica Mountains Local Coastal Program’s Land Use Plan. Its stringent provisions will undoubtedly eliminate threats from industrial wind or solar in these areas. However, no similar protection exists for rural residents and valued viewsheds of the canyons and northern slopes of the San Gabriel Mountains or adjoining Mojave Desert portion of Los Angeles County. This perpetuates social injustice of the existing conditions where less affluent residents and those without resources to oppose large renewable energy projects are being subjected to the majority of impacts and damage to quality of life—including threat of ill health, and loss of property values created by industrial wind and solar installations. This is socially and economically indefensible. Rural communities of the Antelope Valley deserve the same protections from intrusive renewable energy projects.

Yours truly,

Susan Zahnter  
Vice President



Antelope Acres Town Council  
P. O. Box 6708  
Lancaster, California 93539

April 20, 2015

Los Angeles County Department of  
Regional Planning  
Attention: Jay Lee and Susan Tae  
320 W. Temple Street, 13<sup>th</sup> Floor  
Los Angeles, CA 90012  
[jalee@planning.lacounty.gov](mailto:jalee@planning.lacounty.gov)  
[stae@planning.lacounty.gov](mailto:stae@planning.lacounty.gov)

### Renewable Energy Ordinance Comments

The Antelope Acres Town Council has expressed many concerns about the Draft Renewable Energy Ordinance (Ordinance) that have not been addressed.

Glare: In the morning and the evening solar glare is an incredible distraction to drivers and residents even though the EIR states there is no impact. In May 2013, Westside Union School District Trustees voted to raise the solar panels they had installed on two campuses to later in the morning and to lower them earlier in the evening, losing about three hours of sun time per day. This was done to placate the overwhelming objections from nearby homeowners to the morning and evening glare that permeated their houses and made it difficult to look outside. They also complained about the aesthetics and that it destroyed their view and lowered the value of their homes. This problem is repeated on a much larger scale throughout the Antelope Valley.

Approvable study-based mitigation to glare must be formulated and included in the Ordinance.

Cumulative effect of utility scale industrial facilities has not been specifically addressed by the Ordinance. Why was this disregarded? What is the saturation point of renewable energy? This should be in the Ordinance by percentage of A-2 land, which includes 2-1/2 acre parcels.

Permits: All renewable energy projects for sale of energy off premises must be subject to a Conditional Use Permit and a Public Hearing. Minor Use Permits is a loop-hole that needs to be changed. Minor CUPs exempt renewable energy businesses from the Noticing Requirements to the adjacent landowners

and the public. Furthermore, the distance of notification should be increased to at least a five mile radius.

If a permittee can receive a six month extension, how many six month extensions can a permittee apply for? What is the criteria?

A moratorium on new solar industrial installations shall be imposed until adequate studies conducted by independent biologists quantify the effects to the avian population. The Antelope Valley is an Audubon designated globally important bird area and the Pacific Fly Way used by protected migratory and locally indigenous birds. The California Condor is expected to expand over the Antelope Valley. The Centennial Project has already requested the ability to take a certain number of Condors or other protected species in order to build their project.

Specific plans to address the loss of avian foraging areas must be specifically addressed.

Renewable energy must prioritize systems on all homes, apartments, buildings, parking areas, malls and freeways.

We strongly object to the different standards for preservation of scenic views for the coastal zone and the desert zone. As it is written in the Ordinance, the coastal zone is considered environmentally superior than the desert zone. The views of the San Gabriel Mountains and the Tehachapi Mountains are no less breathtaking than the Santa Monica Mountains and deserve equal protection. We demand that this is included in the Ordinance.

The proposed maximum noise level of 60 dBs is inappropriate in rural areas. The ambient noise level in more developed urban areas is up to 50 dB. In rural areas sound and vibration travel much farther distances than in populated areas. Why, since the Ordinance affects a sizeable rural area with many inhabitants, is the ability of sound to travel not addressed? Why was the noise level allowed to be set up to 60 dBs?

The landscaping – buffering requirements are completely inadequate. The current solar projects install tiny plants around the perimeters, and, because they are not required to maintain them properly, they routinely die and are eventually replaced. They will never grow to meet the spirit of the landscaping part of the Ordinance. We insist that the planting of mature trees/bushes with a permanent irrigation system and a County approved landscaper who reports to the County, be written into the Ordinance in order to ensure that the projects will have the industrial look mitigated. The Ordinance only requires “conceptual landscape plans”. This is another loop-hole that needs to be closed.

The use of setbacks and on-site land to be used for mitigation is unacceptable. A two-to-one similar habitat mitigation, preferably contiguous to other open space, must be written into the Ordinance.

The badgers and burrowing owls and siting of foraging hawks have disappeared from every solar project area they were known to be living near. Unfortunately, the projects are only required to conduct biological surveys on their own property without regard to the effect of those animals that live nearby the projects and were well known to local residents. Habitat destruction is one of the main reasons animals become endangered. Biological surveys must be done in a more practical, functional manner.

Part 15 of the Ordinance, as written, does not apply sufficient regulations that would protect rural residents against negative visual impacts. Community Standards Districts are written to protect the visual uniqueness of each community. This includes rules for ridgeline protection, height requirements, and types of development allowed. As part 15 of the Ordinance is written, it can be a loop-hole that supersedes Community Standards Districts. This is unacceptable. There must be specific language that requires adherence to all Community Standard Districts.

In conclusion, please carefully read and address the concerns spelled out in detail in a letter dated March 16, 2015, from Susan Zahnter, President of The Association of Rural Town Councils. We are expecting all these concerns to be addressed. We hope that you specifically pay attention to the photos included at the end of the letter. Many other photos of displaced badgers, kit foxes, and other birds could be provided.

Sincerely,

Virginia Stout  
President  
Antelope Acres Town Council



April 20, 2015

Los Angeles County Department of  
Regional Planning  
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Renewable Energy Ordinance April 22, 2015 Hearing

A SUPERLATIVE ORDINANCE for renewable energy would not infringe on the communities that desire to live in a rural\* environment.

*Rural\*: Non industrial, non commercial and non urban areas that are communities involved with agriculture, farming and livestock activities and lifestyle.*

A Superlative Ordinance for renewable energy would be that which focuses on rooftop solar systems for urban dwellers. It would promote more energy efficiency and conservation at its source of use. It would protect open space from development of numerous massive utility scale renewable energy projects.

A Superlative Ordinance for renewable energy would create more ongoing jobs by construction and maintenance of small scale personal or shared renewable energy systems.

A Superlative Ordinance for renewable energy would be that which would be least disruptive to our natural resources, land, wildlife, and water.

A Superlative Ordinance for renewable energy would be that which does not let developers of utility scale renewable energy facilities decide which ones should be prioritized.

A Superlative Ordinance for renewable energy would prioritize systems on all homes, apartments, buildings, parking areas, malls and freeways. It would make the permitting process much simpler and less costly for single or shared systems, and for responsible, licensed contractors who do this type of construction and installations.

A Superlative Ordinance would be that which conserves and does not expend another natural resource or create a nuisance.

If utility scale renewable energy facilities are permitted, the Water Adjudication process or the County should consider these developments overall as dry conservation projects where groundwater is confined in the ground, on site, as long as the site is being used as a renewable energy transition.

At the March 18, 2015 hearing, two members of the County remarked that native plants do not do well with recycled water, and reclaimed water will destroy native vegetation. (Staff or county counsel should have corrected this. Maybe it was corrected.)

What is not true would be misleading, making it seem like utility scale renewable energy facilities would suffer a hardship to maintain drought tolerant plants for perimeter vegetation.

Recycled water can be trucked.

Treated water for dust control and or natural vegetation landscaping around utility scale renewable energy facilities will not destroy plant life.

Tertiary treated water is safe. It is used for watering grass, for landscaping and at parks, for growing alfalfa and other crops, and at Apollo Park and Piute Ponds. This was confirmed by Mr. Steve Highter of the Wastewater Treatment Center.

Secondary treated water is productively used for crops (not for human consumption, though) and tertiary treated water is safe for ducks and even dogs to swim in and drink. It could be used and should be used for landscaping to cover chain link barbed wire fencing of utility scale facility perimeters.

Re-vegetating disturbed areas of utility scale renewable energy facilities should not reflect a cookie-cutter type style. (Rock, bush, rock, rock, bush, etc.)

A Superlative Ordinance does not leave a bigger footprint than its purpose. Take Hanford, Washington, as an example.

It is noticeably apparent in the newly adopted Antelope Valley Area Wide Plan, by eliminating all Agricultural Opportunity Areas; reducing the size of Significant Ecological Areas; approving no renewable energy projects in what will become commercial Economic Opportunity Areas; and allowing Tejon or Centennial "Planned Communities" with no mention or mandates of renewable energy, Los Angeles County is creating sprawl and growth for the future. A few "token" farms are all that remain of a once historical agricultural legacy of Antelope Valley.

Utility scale renewable energy wind turbines must not be included in the Ordinance. Consequences of thousands of turbines in nearby Kern County blight the viewshed for Los Angeles County. Why would the County want to do even more than that?

The same restrictions for renewable energy for the Local Coastal Communities should apply to the west Antelope Valley. The desert and coastal areas are both integral to each other and not played one against the other.

What is the percentage of renewable energy that remains to be supplied by the County? Why does that percentage need to be achieved by the sacrifice of rural communities, or doesn't the County consider us important enough?

Why is Los Angeles County punishing those of us who happen to live where the sun shines (and the wind blows) and there is still plenty of open space?

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